



Ms Taryn Maroney  
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Dear Ms Maroney

### **Submission on Metering Data Provision Procedures**

Please find attached the Department of Industry and Science's submission on the Metering Data Provision Procedures. We appreciate the opportunity to comment on this work.

As outlined in our submission, the department believes the formats for how data is provided to consumers and their authorised representatives is particularly important in the context of upcoming tariff reforms that will require customers to have a greater understanding of their energy use so they can choose the best tariff to manage their bills.

In finalising this work we believe AEMO should consider consumer needs and how this information will be used. This includes providing information on average load profiles in summary data formats, standardising a single detailed data format to support the development of information services, and ensuring customers know how to request their data, including what information is needed to verify the request.

If you would like further information on this submission, please contact Mr Stuart Richardson on 02 6243 7336 or [stuart.richardson@industry.gov.au](mailto:stuart.richardson@industry.gov.au).

Yours sincerely

Margaret Sewell  
Head of Division  
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## **Department of Industry and Science – Submission to AEMO’s Metering Data Provision Procedures**

The intent of the Access to Data rule change, and hence the data provision guidelines, is to improve consumer access to metering data, and ensure they can access it in a way they can use and understand.

The Department of Industry and Science believes this is an important issue particularly with tariff reforms that will require customers to have a greater understanding of their energy use so they can choose the best tariff to manage their bills.

### **1. Summary data formats for interval data**

In developing the data provision guidelines, AEMO should focus on consumer needs and how the information will be used. The summary format should therefore reflect the basis of charging parameters of tariffs that could be expected to become more widely available and show both consumption (kWh) and demand (kW) where available.

Given most distribution network businesses within the National Electricity Market (NEM), appear to be considering a move to some form of demand-based tariff, customers would need to know when they use their electricity through the provision of summary information on their load profile, if they are to effectively respond to these new tariff structures. For customers who may be considering moving to demand or capacity tariffs, the time and level of maximum demand should also be provided (where available from a smart meter).

The consultation paper acknowledged the need for load profile information, but the example summary format at Appendix B did not reflect this. We believe the summary data format for interval data should be more aligned with the example developed by CUAC as circulated by AEMO at Attachment A, with the addition of information on maximum demand where available.

Presenting summary data by tariff segments may create some issues, particularly where distributors may not have information on the customers’ retail tariff, and where retail tariff structures may not match network tariff structures. In this context, a load profile could be provided without knowledge of the tariff the customer is on.

### **Recommendation**

Summary formats for interval data should include:

- Average daily load profile by season and weekday/weekend (as well as by the proposed tariff segment if appropriate).
- Maximum demand (where available).

### **2. Detailed data formats**

The department sees the standardisation of detailed data formats as being very important in enabling the development of information services which will help customers make efficient choices in relation to their energy use.

In this context, we see the development of one standardised detailed data format as particularly important, rather than allowing market participants to maintain their own customised formats which would increase the cost for information service providers to integrate with. We acknowledge that this should be staged so market participants can schedule system development to align with changes required to address metering and other reforms.

In most cases detailed data formats will be an input into another application. A common consistent format for the delivery of detailed data is unlikely to inhibit innovation, rather it should provide a platform for innovation to occur. However the way the data format is specified, including the file type as csv, should make all compliant formats easily machine readable.

It is unclear if the existing NEM data file formats are being used as the basis for the provision of detailed data formats. In specifying the requirements for the detailed format, the use of this format needs to be considered given that market participants already have systems in place to receive and use these formats. This could minimise the level of systems development required to comply with data format requirements.

If the industry is unable to agree on a common consistent data format, this may be an indication that a more centralised data platform is needed, to facilitate competition and innovation in energy information services.

### **Recommendation**

- One standardised detailed data format should be developed based on NEM data file formats.

### **3. Timing for delivery of data**

The proposal that customer authorised representatives negotiate with retailers/distributors on the timeframe for delivery of data for multiple customers could act as a barrier to access (and a potential loophole under the reasonable endeavours obligation). Setting some limits on maximum response times would be preferable.

Retailers/distributors should be able to provide a response within 10 business days, even if it is an acknowledgement and estimated timeframe for more complex requests. Twenty business days should be sufficient for all but the most complex requests, (which could be subject to negotiation). This issue needs to be considered in the context of who would be making mass requests covering multiple data – for the most part this would be small businesses who have limited negotiating power.

The timeframe in the data provision procedures (and in the rules) set expectations for when consumers should receive data. Customers would form a reasonable expectation that data would be provided to their authorised representative within the same timeframe for an individual request. Any deviation from this timeframe would have to be explained to the consumer – especially if they were waiting on access to receive services from their authorised representative.

The data provision guidelines do not appear to consider provision via retailer web portals. As most retailers (and some distributors) offer online service portals, it would be beneficial to specify that

customers, or their authorised representatives, may be able to download the detailed data format from these portals.

### **Recommendation**

- Where multiple data requests are involved, rather than leave timeframes open to negotiation between a customer's authorised representative and the retailer or DNSP, it may be preferable to set some limits on maximum response times.

## **4. Verification of identity**

Customers and their authorised third parties need to know how to access their data and what will be accepted as consent for an authorised representative to access data. It would assist businesses by reducing the number of incorrectly specified or incomplete data requests if this was clear and businesses were required, through the procedure, to inform customers of how to request access or authorise their representative to receive the data on their behalf. This would include what information is needed to verify the request. This would streamline the process, facilitate data access and be consistent with the reasonable endeavours obligation to provide the data.

A more proactive step could be to develop common methods for establishing identity or consent, as has been done in other industries, which would greatly reduce the time and simplify the process based on common, industry-wide requirements.

### **Recommendation**

- The procedure should require retailers and distributors to publish information on how customers request access or authorise their representative to receive the data on their behalf, including what information is needed to verify the request.